

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revisions to Public Inspection File)	MB Docket No. 16-161
Requirements – Broadcaster Correspondence)	
File and Cable Principal Headend Location)	

To: The Secretary
(via Electronic Filing Using ECFS:
<http://fjallfoss.fcc.gov/ecfs2/>)

COMMENTS OF SAGA COMMUNICATIONS, INC.

Saga Communications, Inc. (“Saga”),¹ by its attorneys, and pursuant to 47 C.F.R. §§ 1.415 and 1.419, files these comments in response to the Notice of Proposed Rulemaking, *Revisions to Public Inspection File Requirements – Broadcaster Correspondence File and Cable Principal Headend Location*, DA 16-62, released May 25, 2016, in MB Docket No. 16-161 (“NPRM”).

Saga fully supports the Commission’s tentative conclusion that it should eliminate the requirement (47 C.F.R. § 73.3526(e)(9)) that commercial broadcasters retain letters and emails from the public in their public inspection files.

As the Commission has recognized, interested listeners and viewers may file comments and/or petitions concerning licensee performance at the time the station files its renewal application. Interested parties can now easily review the public inspection files of most radio stations in the top 50 radio markets and bring concerns to the attention of the Commission.

¹ Saga is a broadcasting company whose business is devoted to acquiring, developing and operating broadcast properties. The company, in its own right, and through subsidiaries, owns or provides advertising sales and programming services to broadcast properties in 26 markets, including 67 FM and 32 AM radio stations, 4 television stations and 5 low-power television stations.

Interested parties also may file a complaint with the Commission regarding a station's performance at any time during the license period. Maintaining correspondence in the local public inspection file has become superfluous. Eliminating the requirement to maintain correspondence from the public will reduce the burden on commercial broadcasters, like Saga, without affecting the public's ability to express to the Commission its concerns.

The Commission invited responses to the following questions:

- 1. Are there other benefits to eliminating the requirement? On the other hand, are there benefits to maintaining local correspondence file obligations we should consider?**

Saga is unable to identify any benefit to maintaining local correspondence files. In fact, counsel polled the Saga's general managers in 26 markets. Of those responding, the managers reported that none of Saga's stations has had any member of the public in the last 5 years visit a Saga station to review the local correspondence file. When there have been visits from the public, counsel has been advised that the visits have been to review the political file and not the correspondence portion of the local public file.

- 2. How frequently do local consumers or others make use of the correspondence file?**

As noted above, such persons rarely, if ever, make use of the correspondence file.

- 3. Does it contain information that continues to be useful to local viewers or listeners, or other interested parties, that cannot be obtained through other means?**

The answer is "no."

- 4. What impact does the use of social media by broadcast stations have on viewers' ability to communicate with the stations and others regarding the stations' programming and other issues?**

All of the "clusters" of radio stations owned or operated by Saga utilize Facebook and receive many comments from listeners. These comments assist management in crafting

programs to meet the public interest, and they can be readily reviewed by other listeners by simply logging onto Facebook.

5. We request that commenters explain how any benefits of either eliminating or retaining local correspondence rules would outweigh any potential costs.

Saga cannot perceive any benefits to retaining local correspondence in the public file as members of the public rarely review the local public files at all. As noted in the NPRM, the Commission first required commercial radio and television broadcasters to retain written comments and suggestions from the public and make them available for public inspection in 1973.² Arguably, in 1973, when there were far fewer radio and television stations, no internet, and cable television that merely relayed distant broadcast signals, this rule had some *raison d'être*. In 2016, after 43 years of progress, the Commission should acknowledge that the rule has outlived its usefulness and eliminate it.

Respectfully submitted,

SAGA COMMUNICATIONS, INC.

By:



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² See *Formulation of Rules and Policies Relating to the Renewal of Broadcast Licenses*, 43 FCC 2d 1, *recon. granted in part on other grounds*, 44 FCC 2d 405 (1973).